

IN THE UNITED STATE DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
EASTERN DIVISION

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PROGRESSIVE PREFERRED
INSURANCE COMPANY
Plaintiff

DEBRA P. HACKETT, CLK
U.S. DISTRICT COURT
MIDDLE DISTRICT ALA

vs.

CASE NO. 3:06-CV-00934

JMP ENTERPRISES, INC.;
JOHN MARK PARKER; and
JENNIFER M. GOLDEN
Defendants

MOTION FOR SUMMARY JUDGMENT BY JENNIFER GOLDEN

Comes now Jennifer Golden, one of the defendants, and moves the court to enter a summary judgment holding that Progressive's policy of insurance, together with the endorsements to such policy, provide coverage for the allegations of Jennifer Golden's First Amended Complaint in the Circuit Court of Lee County, Alabama, Case No. 2006-106. As grounds for this motion, Golden alleges that no genuine dispute exists in the materials facts concerning coverage, and she is entitled to judgment as a matter of law.

More particularly, Golden alleges that she is entitled to judgment as a matter of law for the reasons stated in her brief filed herewith which is entitled "Golden's Brief in Opposition to Progressive's Motion for Summary Judgment and in Support of Her Motion for Summary Judgment." Golden's "Statement of Undisputed Facts" is contained in such brief.

This motion is based on the pleadings and Golden's evidentiary submission entitled "Golden's Evidentiary Submission in Opposition to Progressive's Motion for Summary Judgment

and in Support of Her Motion for Summary Judgment.” Such evidentiary submission is also filed simultaneously with this motion.

HOWARD, DUNN, HOWARD & HOWARD

Attorney for Jennifer M. Golden

By: 

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CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing on:

R. Larry Bradford

Bradford & Sears, P.C.

2020 Canyon Road, Suite 100

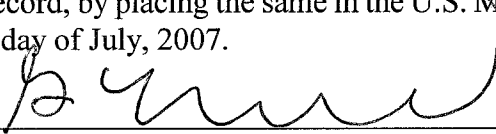
Birmingham, AL 35216

John Mark Parker

P. O. Box 3501

LaGrange, GA 30242

counsel of record, by placing the same in the U.S. Mail, postage prepaid and properly addressed, on this the 10th day of July, 2007.



Of Counsel

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